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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

STEPHEN SNEED, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

THE PROCTER & GAMBLE COMPANY,

Defendant.

Case No.: 4:23-cv-5443-JST

Complaint Filed: October 23, 2023

FAC Filed: January 26, 2024

SAC Filed: September 16, 2024

*Assigned for all purposes to Hon. Jon S.
Tigar*

**JOINT STIPULATION AND
[PROPOSED] ORDER TO MODIFY
CLASS CERTIFICATION SCHEDULE**

*[Declaration of Bahar Sodaify concurrently
filed herewith]*

Pursuant to the Standing Order for District Judge Jon S. Tigar, Article K, and Civil Local Rules 6-1, 6-2, and 7-12, Plaintiff Stephen Sneed (“Plaintiff”) and Defendant The Procter & Gamble Company (“P&G” or “Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby jointly stipulate to continue dates and deadlines set forth in Court’s Scheduling Order (ECF No. 68) as follows.

RECITALS

WHEREAS, on October 23, 2023, Plaintiff filed the Class Action Complaint (ECF No. 1);

WHEREAS, on January 26, 2024, Plaintiff filed the First Amended Class Action Complaint (ECF No. 23);

WHEREAS, on August 19, 2024, the Court granted in part and denied in part P&G’s motion to dismiss the First Amended Class Action Complaint (ECF No. 45);

WHEREAS, on September 16, 2024, Plaintiff filed the Second Amended Class Action Complaint (ECF No. 47);

WHEREAS, on April 4, 2025, the Court denied P&G’s motion to dismiss the Second Amended Complaint (ECF No. 66);

WHEREAS, on April 9, 2025, the Court issued its Scheduling Order, setting Plaintiff’s deadline to file a motion for class certification and serve opening expert disclosures for October 30, 2025, along with associated briefing and expert-discovery deadlines (ECF No. 68);

WHEREAS, on September 5, 2025, Plaintiff served a Fed. R. Civ. P. 30(b)(6) deposition notice on P&G for October 7, 2025;

WHEREAS, on September 11, 2025, the Court set September 19, 2025 as the deadline for substantial completion of P&G’s production (ECF No. 86);

WHEREAS, on September 19, 2025, P&G substantially completed its production, which consisted of over 5,000 pages of documents;

WHEREAS, on September 23, 2025, P&G offered its two Fed. R. Civ. P. 30(b)(6) designees for deposition, who due to scheduling constraints are available on October 23, 2025 and October 30, 2025;

WHEREAS, in order to allow adequate time for Plaintiff to review P&G's production and complete a Rule 30(b)(6) deposition before moving for class certification, the Parties agree a modest extension of the existing class certification schedule would be appropriate;

WHEREAS, the effect of the requested time modification will be to adjust the class-certification briefing and related expert-discovery deadlines set by ECF No. 68;

WHEREAS, in light of the foregoing, the Parties stipulate to a limited continuance of the current deadlines as follows:

Event	Current Date (ECF No. 68)	Continued Date
Class certification motion and Plaintiff's class certification expert disclosures due	October 30, 2025	December 8, 2025
Class certification opposition and Defendants' class certification expert disclosures due	January 15, 2026	February 23, 2026
Class certification expert discovery cut-off	February 27, 2026	April 7, 2026
Class certification reply due	April 24, 2026	June 2, 2026

IT IS SO STIPULATED AND AGREED:

DATED: October 1, 2025

CLARKSON LAW FIRM, P.C.

By: /s/ Bahar Sodaify
 Ryan J. Clarkson
 Bahar Sodaify

Attorneys for Plaintiff

DATED: October 1, 2025

COVINGTON & BURLING LLP

By: /s/ Cortlin H. Lannin
 Andrew Soukup
 Cortlin H. Lannin
 Sameer Aggarwal

Attorneys for Defendant The Procter & Gamble Co.

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: _____, 2025

The Honorable Jon S. Tigar
United States District Judge

ATTESTATION OF FILER

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: October 1, 2025

CLARKSON LAW FIRM, P.C.

By: /s/ Bahar Sodaify
Bahar Sodaify